

Sludge Disposal Management Plan Preparation Guidelines

A generator of sludge is required to prepare a Disposal Management Plan (DMP) prior to disposal of the sludge at a landfill or other approved disposal facility permitted to accept sludge. Prior to the landfill's acceptance of the sludge for disposal, a generator-specific DMP must be prepared by the generator of the sludge. The DMP must be reviewed and approved by the New Mexico Environment Department's (NMED) Solid Waste Bureau (SWB) prior to disposal of the sludge. The DMP must also be accepted and implemented by the disposal facility prior to disposal of the sludge.

In accordance with the special waste requirements for sludge, as addressed under the New Mexico Solid Waste Rules (SWR), 20.9.8.16 NMAC, the following outline is provided to assist in the preparation of a DMP:

Title Page or Cover Letter on Company or Governmental Letterhead
Provide the facility name, address and location

Address Cover Letter and Mail to:
Manager, Enforcement Section
Solid Waste Bureau
New Mexico Environment Department
1190 St. Francis Drive
P.O. Box 5469
Santa Fe, New Mexico 87502-5469

Include a Table of Contents (optional, but suggested)

The Following Sections are Generally Required in the DMP:

- A. Current Operations – Explain the current waste water or water treatment plant operations including type of operation; origin of sludge (e.g. city system, septic, supply well, or other); estimated sludge generation rate per year; current volume of stockpiled sludge, if applicable; explain how generated sludge will be stored or stockpiled prior to disposal (include estimated volume to be stored, and other details); provide anticipated volumes to be transported and frequency of disposal.
- B. Disposal Facility – Identify the landfill(s) or other disposal facilities where sludge is to be disposed. Ensure disposal facilities are permitted to accept sludge and provide the physical address, state-issued permit number and identity of the facility operator. When available, attach copies of the correspondence between the disposal facility and the treatment plant operator. When included, such correspondence should demonstrate the disposal facility's awareness of the nature of the sludge, estimated quantity or volume, necessary sampling frequency and parameters for testing of the sludge, and the willingness to incorporate the terms of the DMP into the disposal facility's records and operations. The DMP should also include a description of the disposal method or alternate use of the sludge at the landfill (as indicated by the operator of the proposed disposal facility). Prior to transporting sludge to an approved disposal facility, a copy of the landfill operator's written acceptance of the DMP shall be provided to the SWB.

- C. Sludge Transportation – Provide assurance that a current and properly registered commercial or special waste hauler authorized for the transport of sludge is proposed. If such a hauler has not been selected at the time of the DMP submittal, insert a statement in the DMP indicating that the identity of the proposed hauler will be provided to the SWB at least 10 days prior to commencement of hauling, thereby allowing the SWB time to verify the registration status of the hauler. If a hauler has been selected, identify the registered hauler by business name, address, certificate number and contact person. Assert that a special waste manifest meeting all the requirements of 20.9.8.19 NMAC will be used for each load of sludge to be transported, to include all necessary signatures, dates, addresses, telephone numbers, and permit or registration numbers. Assert that the generator will retain copies of both the originating and finalized manifests for a period of at least three years, and that such manifests will be made available to the SWB for inspection, upon request. Finally, indicate the truck route to each of the disposal facilities planned for use, beginning at the generating location (e.g., waste water or water treatment plant). While not required, it is preferred that a route map be attached.
- D. Sludge Sampling and Analysis – Explain how collected sludge samples will be representative in nature (e.g., a number of grab samples will be collected and mixed together from various locations and depths from the drying bed or stockpile to comprise one representative sample, or a grab will be taken from the belt press just prior to tipping into the transporting truck and/or storage container). Provide the frequency of sampling and analysis in order to meet the requirements under the SWR, 20.9.8.16.C(1) NMAC, which specifies one representative sample per 100 cubic yards. *[Note: An alternative sampling and analysis frequency can be approved by the SWB, but must be approved in writing and is typically an option that generally follows SWB review of laboratory reports from several rounds of sludge sampling, leading to a determination that the sludge is homogeneous. Such request must be specifically made by the generator in writing and submitted to the SWB under separate cover.]* Identify the analytical laboratory to perform the analysis by business name, address and telephone number, and provide a written assurance that the proposed laboratory follows QA/QC procedures in accordance with U.S. EPA approved methods. Include a statement acknowledging that all sludge analytical results require SWB approval prior to initial disposal and thereafter as indicated in the approved DMP.

The generator is required to test a representative sample of the sludge for the following parameters listed below, in accordance with the SWR, 20.9.8.16.D NMAC. Request from the selected laboratory the required analysis results, and when available, also request copies of the chain-of-custody form identifying the requested analyses and the laboratory's QA/QC report. These documents may be provided to the SWB under separate cover, or in the case of a new or revised DMP, as an attachment to the DMP.

Required Sludge Analysis Parameters¹:

20.9.8.16.D. NMAC Prior to delivery of sludge to a solid waste facility for disposal, the generator shall test a representative sample for the following parameters to determine if it exceeds the specified limits below:

- (1) no free liquids as determined by paint filter liquids test¹ (U.S. EPA test method 9095), *unless exempt in accordance with 20.9.4.17 NMAC (Research, Development, and Demonstration Permits);*
- (2) percent solids (no specified limits)¹;
- (3) pH, within the range of 2.0 to 12.5¹;
- (4) polychlorinated biphenyls (PCBs), *less than 50 mg/Kg; and*

(5) toxicity characteristic leaching procedure (TCLP) (U.S. EPA test method 1311), for the following parameters and maximum allowable concentrations:

- (a) arsenic, 5.0 mg/L¹;
- (b) benzene, 0.5 mg/L;
- (c) cadmium, 1.0 mg/L¹;
- (d) chlordane, 0.03 mg/L;
- (e) chromium, 5.0 mg/L¹;
- (f) 2,4-Dichlorophenoxy-acetic acid, 10.0 mg/L;
- (g) lead, 5.0 mg/L¹;
- (h) lindane, 0.4 mg/L;
- (i) mercury, 0.2 mg/L¹;
- (j) methyl ethyl ketone, 200.0 mg/L; and
- (k) toxaphene, 0.5 mg/L.

Prior to transporting sludge to an approved disposal facility, a copy of the laboratory analysis shall be provided to the SWB for review and approval.

- E. Contingency Plan or Actions – Explain the actions necessary in the event of an unplanned release or spill and how the material will be contained, cleaned up, and how the spill area will be disinfected. This is also required by the registered sludge hauler while the waste is in transport and a similar incident is encountered.
- F. Future Changes to the DMP Requires Notification – Insert an acknowledgement that any future changes or deviations from the terms and requirements of the approved DMP require prior notification to the SWB for review and approval.
- G. Attachments – List and label all attached documents, including letters or other correspondence, maps, special waste manifest examples, laboratory reports and related documentation, and all other exhibited items.

¹ Reduced Parameter List for Water Treatment Sludge (e.g. cooling tower water, drinking water filter media), absent any reason to require additional parameters; SWB policy guidance from March 9, 2011 (revision).